

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff)
)
v.) **SA-13-CR-655-XR**
)
MARCIANO MILLAN VASQUEZ (5),)
GUSTAVO RODRIGUEZ-COSTILLA(14),)
)
Defendants.)

NOTICE OF INTENT TO USE BUSINESS RECORDS

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this Notice of Intent informing the Court, and all parties involved, of the Government's intent to introduce into evidence business records, at the trial of the above-named Defendants, via Self-Proving Affidavits, and would respectfully show the Court the following:

Pursuant to Fed.R.Evid.Rule 803(6)(7)(8) and (15), it is the Government's intention to introduce into evidence business records obtained pursuant to subpoenas issued by the Government. Among the records that will be introduced are, but not limited to, business records from telephone companies, vehicle title data, and other businesses records. These records were kept by an employee for that company in his or her regular conducted course of business activity.

Additionally, pursuant to Fed.R.Evid.Rule 902(11), government records will be introduced via a Self-Proving Affidavit from the Custodian of Record and/or an employee of that agency having produced, maintained and/or kept the records in his or her regular

course of business and in his or her capacity as an employee of that company. A copy of the affidavits will be made available to the defense.

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By:

/s/
Russell D. Leachman
Assistant U.S. Attorney
Texas Bar #12069710
601 NW Loop 410
San Antonio, Texas 78216

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of May, 2016, a copy of the Government's Notice of Intent was filed *via* ECF filing.

/s/
Russell D. Leachman
Assistant U.S. Attorney